

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Anne Marie Cavanaugh,

Plaintiff,

v.

City of Seattle,

Defendant.

No. \_\_\_\_\_

DECLARATION OF ANNE MARIE  
CAVANAUGH

I, Anne Marie Cavanaugh, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.
2. I am a Washington resident.
3. I attended a protest in support of Black Lives Matter – for the second time ever – in Seattle on July 25, 2020.
4. After my experiences at that protest, I decided I cannot go back until I figure out how to get protective eye gear. I was taken aback by the onset of violence: myself and other protesters had marched from Capitol Hill through the Central District and down towards the jail. But when the protest marched near the precinct, SPD just started shooting and gassing us.
5. I was very scared and very concerned about my safety – it was very sudden.

- 1 6. I did not have protective gear so I put on sunglasses, all I had – it was a shocking  
2 experience.
- 3 7. As a longtime union staffer, I have been to my share of protests as an activist.
- 4 8. I have never felt so threatened – so out of control – as I did on the streets of Seattle  
5 July 25, 2020. It was haphazard, people were running, there was no advance  
6 notice: they just started shooting and gassing.
- 7 9. I am 54 – I am not sure what I would need to be safe at a protest in the future but  
8 would imagine I would need at a minimum some protective eye covering, a gas  
9 mask. I am not sure what is required; it makes me scared to go back because I feel  
10 too threatened by what could happen to me. I think maybe a shield would help.
- 11 10. I am hoping to get guidance from younger protesters as to where and how to get  
12 protective gear – I do not know where to even begin. It is overwhelming and has  
13 definitely made “going to protest” a pre-planned, extremely involved event.

14 Executed this 3<sup>RD</sup> day of August 2020 at Tacoma, WA.

15 I declare under penalty of perjury under the laws of the United States and the State of  
16 Washington that the foregoing is true and correct.

17       /s/ Anne Marie Cavanaugh  
18 Anne Marie Cavanaugh  
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